

Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DENISE BAKER and JASON BAKER, husband
and wife

Plaintiffs,

v.

AMERICAN BANKERS INSURANCE
COMPANY OF FLORIDA, a foreign company,
Defendant.

No.: 2:23-cv-01935-JLR

**JOINT STATEMENT RELATING TO
USE OF STIPULATED PROTECTIVE
ORDER**

Pursuant to the Honorable Court's May 23, 2024 Minute Order (Dkt. 16), Plaintiffs Denise Baker and Jason Baker ("Plaintiffs") and Defendant American Bankers Insurance Company of Florida ("ABIC") hereby file their Joint Statement informing the Court whether they are using the model order and providing the redlined version of the protective order.

Plaintiffs and ABIC have agreed to utilize the Western Washington District Court Model Protective Order with modifications identifying the nature of the material that may be deemed confidential pursuant to the Protective Order, and the parties to whom confidential material may be disclosed. A redline version of the model protective order is attached hereto as Exhibit "1".

///

1 Dated: May 30, 2024

FREEMAN MATHIS & GARY, LLP

2 *s. Galina Kletser Jakobson*

3 Galina Kletser Jakobson, WSBA #49501
4 *Attorneys for Defendant American Bankers*
5 *Insurance Company of Florida*

6 Dated: May 30, 2024

ROBERT D. BOHM, PLLC

7 *s/Robert D. Bohm via email approval*

8 Robert D. Bohm, WSBA #42703
9 *Attorneys for Plaintiffs*

10 Dated: May 30, 2024

BASTION LAW, PLLC

11 *s/Jesse Froehling via email approval*

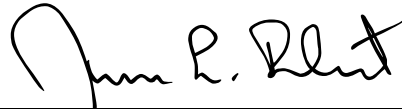
12 Jesse Froehling, WSBA #47881
13 *Attorneys for Plaintiffs*

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

IT IS FURTHER ORDERED that pursuant to Fed. R. Evid. 502(d), the production of any documents in this proceeding shall not, for the purposes of this proceeding or any other federal or state proceeding, constitute a waiver by the producing party of any privilege applicable to those documents, including the attorney-client privilege, attorney work-product protection, or any other privilege or protection recognized by law.

DATED this 30th of May, 2024.



Honorable James L. Robart
United States District Court Judge